

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: March 1, 2019
2. Name of companies covered by this certification:
Alteva of Warwick, LLC. Form 499 Filer ID 804651
3. Name of signatory: Todd Zittrouer
4. Title of signatory: Chief Executive Officer

Certification:

I, certify that I am an officer of Alteva of Warwick, LLC (known as the "Company") and, acting an officer and as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, as summarized in the attached statement, that are adequate to ensure compliance with the Commission's customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001, *et seq.* of the Commission's rules.

The Company has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI. Company has not taken any actions in the past year against data brokers, including proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.


Todd Zittrouer
Chief Executive Officer
Alteva of Warwick, LLC.
Executed February 28, 2019

ALTEVA OF WARWICK, LLC
STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

Alteva of Warwick, LLC (“Alteva”) will use, disclose, or permit access to CPNI only in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service, including the publishing of directories; to initiate, render, bill and collect for telecommunications services; to protect the its rights or property, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer. Alteva does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Alteva has trained its personnel not to use CPNI for marketing purposes. Should Alteva elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Alteva has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Alteva has procedures in place to report any CPNI breaches (as defined by the FCC) to law enforcement and customers in accordance with the FCC’s rules. The Company maintains a record of any breaches for at least two years including, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Alteva has processes in place to safeguard CPNI from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized Alteva personnel have access to the database. It is not accessible by anyone outside the company.

Alteva does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

Alteva does not provide call detail records to inbound callers. It may instead provide such information upon request to the customer's address of record.

When an address of record is created or changed, except in connection with the customer's initiation of service, Company will immediately send a notice to customer's pre-existing address of record notifying them of the change. Such notices will not reveal the changed information, and will direct the customer to notify its service provider immediately if they did not authorize the change.